SUPPLEMENTAL REPLY DECLARATION OF
KATHLEEN McLEAN, RAYMOND WIERZBICKI, AND
CATHERINE T. WEBSTER

ATTACHMENT 16

verizon

January 24, 2002

**Verizon's Position on IntraLATA Calls, Collect and Third Number Calls**

This notice summarizes Verizon's position on responsibility for charges for intraLATA toll calls placed by reseller end user customers and collect or third number calls accepted by such customers.

<u>Intralata Toll Calls</u>

The reseller is responsible for and is obligated to pay Verizon all charges incurred by reseller customers who order, activate or use Verizon services, including without limitation, any and all charges for intraLATA toll calls made by end user customers who dial 10+XXX to access the Verizon network on resold lines ordered with a "PIC NONE" or "LPIC NONE" designation. In accordance with the terms of your resale agreement, Verizon will continue to provide you intraLATA toll usage records on a Daily Usage File so that you may bill your end user customers for these intraLATA toll calls.

You may order Verizon call blocking services such as TD7 and DHL (where and to the extent Verizon offers such blocking services to its own retail customers) to restrict your end user customers' ability to make intraLATA toll calls. A "PIC NONE" or "LPIC NONE" designation on an order for resold lines serves only to indicate that the end user is not presubscribed to an intraLATA toll provider; such a designation <u>is not</u> an order for call blocking services.

<u>COLLECT AND THIRD NUMBER CALLS</u>:

The reseller, not Verizon, is responsible to bill the resellers' customers for third number and collect calls. If you wish to restrict your end users' ability to accept such calls, you may order the following Verizon Toll Billing Exception ("TBE") screening services: (1) TBE A, to screen third number and collect calls; (2) TBE B, to screen only third number calls; and (3) TBE C, to screen only collect calls. <u>Verizon does not guarantee that TBE service will block all collect or third number calls</u>. TBE requires a manual screening process by an operator into the Line Identification Database ("LIDB"). TBE can be effective only if operators access and abide by the LIDB validation response system. Not all alternate operator service providers or inter-exchange carriers have opted to participate in this screening process. Additionally, TBE screening services are designed to identify only domestic third number and collect calls and the database which processes the screen may be unavailable at times. Resellers must inform their end users that the TBE service is not a guaranteed block, and that some calls may go through and will be billed accordingly. In any case, Verizon will bill the reseller for third number and collect calls if its end user customer accepts the charges for such calls. The reseller remains responsible to bill its end user customer for all third number and collect call charges, which the end user accepts.

If you have any questions, please contact your Account Manager.

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**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, DC 20554**

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|---|---|---|
| In the Matter of<br><br>Application by Verizon New Jersey Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in New Jersey | )<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>) | WC Docket No. 02-67 |

**SUPPLEMENTAL REPLY DECLARATION OF**
**ELAINE M. GUERARD, JULIE A. CANNY, AND MARILYN C. DEVITO**

## I. Introduction

1. My name is Elaine M. Guerard. I am Vice President – Wholesale Performance Assurance for Verizon Services Group. My qualifications are set forth in a Declaration that Julie A. Canny, Marilyn C. DeVito, and I filed with Verizon's New Jersey Section 271 Application on December 20, 2001. I am accountable for the entire supplemental reply declaration.

2. My name is Julie A. Canny. Executive Director – Regulatory Support for Wholesale Performance Assurance for Verizon. My qualifications are set forth in a Declaration that Elaine M. Guerard, Marilyn C. DeVito, and I filed with Verizon's New Jersey Section 271 Application on December 20, 2001. I am accountable for the entire supplemental reply declaration.

3. My name is Marilyn C. DeVito. I am Director for Wholesale Performance Assurance. My qualifications are set forth in a Declaration that Elaine, M. Guerard, Julie A. Canny, and I filed with Verizon's New Jersey Section 271 Application on December 20, 2001. I am accountable for Part III of the supplemental reply declaration.

## II. Purpose

4. The purpose of our reply declaration is to address certain inaccurate or misleading statements contained in the comments filed in this proceeding by AT&T, MetTel, NALA/PCA, and Metro Teleconnect concerning (a) the performance measurements that the New Jersey Board of Public Utilities ("BPU") established to monitor the performance Verizon provides to CLECs; (b) the processes and procedures by which Verizon makes changes to its calculation of those measurements; and (c) the Incentive Plan ("Plan") that the New Jersey BPU has established.

5. As we demonstrated in our Declaration and in our Reply Declaration, Verizon is subject to a comprehensive set of performance measurements for service timeliness, reliability, and quality. We also demonstrated that Verizon's reporting of those measurements and its metrics change control processes have been independently reviewed and validated. Finally, we demonstrated that, as discussed further below, Verizon is subject to self-executing enforcement mechanisms that are sufficient to ensure compliance with established performance standards. The BPU agrees that the guidelines in New Jersey "provide a comprehensive set of performance measurements, standards and reports" that "allow the Board and the CLECs to determine whether Verizon NJ is providing wholesale services as required by the [1996 Act]." New Jersey BPU Report at 1, 80. The BPU also found that the New Jersey Plan "establishes appropriate financial incentives for VNJ, an audit mechanism for the Board and the CLEC community to avail itself of, and encompasses an extensive number of metrics." See Application by Verizon New Jersey Inc., et al for Authorization To Provide In-Region, InterLATA Services in New Jersey, Ex parte Letter from Clint Odom to Magalie R. Salas, CC Docket No. 01-347 at 20 (FCC filed Jan. 17, 2002).

## III. Performance Measurements

6. As we explained, the New Jersey BPU has established performance measurements for use in New Jersey through a multi-year, on-going series of proceedings. See Guerard/Canny/DeVito Decl. ¶¶ 14-20. In January 2002, the New Jersey BPU required Verizon to add certain Pennsylvania electronic billing measurements to the New Jersey Guidelines. See Guerard/Canny/DeVito Reply Decl. ¶ 8. Verizon also revised the business rules for three other measurements to clarify that they apply to both paper and BOS BDT bills. See id. Verizon began reporting its performance under these measurements with the February 2002 data month.

7. NALA/PCA and Metro Teleconnect — which did not participate in the BPU's performance measurement proceeding or in the state 271 proceedings, and did not file comments in response to Verizon's original Application — now raise arguments concerning the measurements contained in Verizon's current performance reports. Their complaints, however, are simply disagreements with the decisions the New Jersey BPU has made in establishing those measurements and, therefore, should have been raised with the BPU in the first instance.

8. NALA/PCA and Metro Teleconnect first complain that the New Jersey Guidelines do not include measurements for the timeliness of billing claim acknowledgement and of billing claim resolution. See NALA/PCA Comments at 4; MetroTeleconnect Comments at 4-5. As we have explained, although state commissions in other Verizon jurisdictions have adopted such measurements, the New Jersey BPU has not revised the New Jersey Guidelines to include either the interim measurements that have been adopted in New York or the more developed versions of those measurements created during Verizon's Pennsylvania application. See Guerard/Canny/DeVito Decl. ¶¶ 22, 122. Nor have CLECs in New Jersey requested that the BPU adopt these measurements. However, we previously presented Verizon's performance under these measurements for October through December 2001. See id. Attach. 4;

Guerard/Canny/DeVito Reply Decl. Attach. 3. Attachment 1 to our supplemental reply declaration contains Verizon's performance on these measurements for December 2001 through February 2002, which consistently meets the standards.

9. Attachment 1 also includes Verizon's performance on BI-2-02-2030 (Timeliness of Carrier Bill – Electronic Bills – BOS BDT Format) for October 2001 through February 2002. Verizon has discovered that, in Attachment 4 to our Declaration, Attachment 3 to our Reply Declaration, and the February 2002 Carrier-to-Carrier Report, the performance data reported did not capture all of the BOS BDT bills distributed during the respective data months. Attachment 1 includes restated performance data for these months. However, because 100 percent of CLECs' BOS BDT bills were distributed on time in all five months, this restatement results is no change in Verizon's performance.

10. NALA/PCA and Metro Teleconnect also take issue with the billing timeliness measurement (BI-2) in the New Jersey Guidelines. See NALA/PCA Comments at 4 & n.6; Metro Teleconnect Comments at 3 n.5. These commenters do not dispute that Verizon has consistently delivered 100 percent of CLECs' bills within the 10-business-day standard adopted by the New Jersey BPU, which is the same standard that is in place in New York, Massachusetts, Connecticut, Pennsylvania, Rhode Island, and Vermont. See Performance Trend Report at 20 (Supplemental App. B, Tab 2); see also Attachment 1; Guerard/Canny/DeVito Decl. Attach. 4; Guerard/Canny/DeVito Reply Decl. Attach. 3. Instead, they claim that the standard for this measurement should be three calendar days. See NALA/PCA Comments at 4 & n.6; Metro Teleconnect Comments at 3 n.5. Again, these commenters raise issues here that should be raised, in the first instance, before the BPU.

11. Finally, NALA/PCA and Metro Teleconnect complain that "[f]our of the reported eight metrics exclude charges for post-completion discrepancies." Metro Teleconnect Comments at 3; accord NALA/PCA Comments at 4. This is incorrect in a number of respects. Verizon currently reports eighteen billing measurements. See Performance Trend Report at 19-23 (Supplemental App. B, Tab 2). Although five of those measurements exclude post-completion discrepancies (BI-3-03-2030, BI-3-06-2030, BI-6-02-2030, BI-7-02-2030, BI-8-02-2030), all but one of them have corresponding measurements that include post-completion discrepancies (BI-3-01-2030, BI-6-01-2030, BI-7-01-2030, BI-8-01-2030). However, the New Jersey BPU, like the Pennsylvania PUC, has determined that the measurements that exclude post-completion discrepancies should have a parity standard, while the measurements that include such discrepancies should be reported for diagnostic purposes only.

CLEC-Specific Performance Data

12. In its comments, MetTel repeatedly complains that it did not have access to the "flat files" that contain the purchase-order-number-level detail that Verizon uses to calculate the performance measurements and that enable CLECs to replicate the performance data if they so choose. See MetTel Comments at 4-5; MetTel's Goldberg Decl. ¶¶ 4, 6 & n.5. As explained below, MetTel misstates the facts surrounding its request for these files.

13. Each month, Verizon produces a Carrier-to-Carrier ("C2C") report containing its performance results in New Jersey for all CLECs, in the aggregate, and for the various retail comparison groups. In addition, Verizon also produces and provides, on a going-forward basis, CLEC-specific C2C reports and "flat files" to those CLECs that request one or both of them. Verizon's policy is not to produce these reports for past data months, given the burdens involved in retrieving and processing the retail and CLEC-specific data.

14. In New Jersey, Verizon currently provides more than 60 CLEC-specific C2C reports each month to more than 15 CLECs (some CLECs have multiple CLEC identifiers). On February 22, 2002, MetTel, through its account manager, requested its CLEC-specific reports in New Jersey, retroactive to November. MetTel did not, at that time, request its CLEC-specific flat files in New Jersey. Verizon informed MetTel that it does not provide retroactive reports and that, given the late date of its request (January data month reports were due only three days later), it would receive its first CLEC-specific C2C report (for the February 2002 data month) on March 25, 2002. MetTel received this report, via e-mail, on March 25, 2002. Thus, to the extent MetTel implies that Verizon failed to provide MetTel with this report on March 25, 2002, it is incorrect. See MetTel's Goldberg Decl. ¶ 6 & n.5. Alternatively, to the extent MetTel implies that Verizon had promised to provide MetTel its CLEC-specific flat file for the February 2002 data month, this too is incorrect. See id. Verizon also provided MetTel with a copy of its CLEC-specific C2C report, on CD-ROM, on April 4, 2002, pursuant to MetTel's request on April 2, 2002, for "soft copies" of all MetTel-specific data included in Verizon's Supplemental Filing.

15. In New Jersey, very few CLECs have requested their CLEC-specific flat files and, through the February 2002 data month, Verizon was providing such files to only two CLECs. On March 22, 2002, MetTel, through its account manager, requested for the first time its CLEC-specific flat files in New Jersey, again retroactive to November. Verizon again informed MetTel that it does not provide retroactive reports and that, given the late date of its request (February data month reports were due only three days later), it would receive its first CLEC-specific flat file (for the March 2002 data month) on April 25, 2002. Verizon has subsequently informed MetTel that, despite Verizon's normal procedures, it would also provide MetTel with its flat files

for the November 2001 through February 2002 data months at approximately the same time that MetTel receives the flat files for the March 2002 data month.

16. Although MetTel claims to have placed requests for its CLEC-specific C2C reports and flat files "dating back to the commencement of the NJ 271 process," MetTel's Goldberg Decl. ¶ 6 n.5, Verizon's Wholesale Metrics Reporting Team has no record of any request made by MetTel in New Jersey for its CLEC-specific C2C reports prior to February 22, 2002, or for its flat files prior to March 22, 2002. MetTel has provided no evidence of having made such requests prior to those two dates. In contrast, MetTel has been receiving its CLEC-specific C2C reports and flat files in New York, pursuant to its request in that state, since May 2000. MetTel has been receiving its CLEC-specific C2C reports in Pennsylvania and Connecticut since October 2000 and May 2001, respectively.

Metrics Change Control Notification Process

17. As we have explained, Verizon has implemented a metrics change control notification process in New Jersey, which was thoroughly reviewed and validated by KPMG, that provides the BPU and CLECs with far more information about the changes implemented to the performance measurements and calculations than Verizon provides in New York, Massachusetts, Connecticut, Pennsylvania, Rhode Island, or Vermont. See Guerard/Canny/DeVito Decl. ¶ 141; Guerard/Canny/DeVito Reply Decl. ¶ 17. However, the underlying metrics change control process is the same in each of these states.

18. AT&T, however, repeats its earlier argument that the number of change controls issued demonstrates that Verizon's reported data is unreliable. See AT&T at 23-26. The New Jersey BPU already considered and rejected this exact claim, stating that it "disagrees with the CLECs that the number of change control[] notifications that have been issued impugns the

accuracy and reliability of the C2C reports." New Jersey BPU Report at 80. "To the contrary, they indicate Verizon NJ's necessary commitment to improvement where areas of concern arise." Id.

19. Furthermore, we previously explained that there was no support for AT&T's claim that the issues identified through the metrics change control process "could have a significant impact on whether Verizon actually met the relevant performance standard." Guerard/Canny/DeVito Reply Decl. ¶ 20 (quoting AT&T's Bloss/Nurse Decl. ¶ 33). We demonstrated that the various change control notices that AT&T referenced did not result in material changes to the performance results. See id. ¶¶ 21-25. We further explained that, when changes are material, they are equally likely to increase as to decrease the reported quality of Verizon's performance. See id. ¶¶ 19-20. Notably, although AT&T lists 26 metrics change control notifications that were issued after January 14, 2002, it does not even claim that any of these notifications had a material effect on Verizon's reported data.

20. AT&T also incorrectly implies that each of the 26 metrics change control notifications it lists represents a newly discovered data calculation error. As we explained in our Declaration, under the Change Control Notification Process, Verizon notifies the BPU and New Jersey CLECs when it schedules a new metrics change control and also when it completes, retracts, or reschedules a change control. See Guerard/Canny/DeVito Decl. ¶ 143. For example, as shown in the "status" field of the notifications themselves, 20 of the 26 notifications included in Attachment 1 to AT&T's comments simply inform the CLECs that Verizon has completed implementation of a metrics change control that had been announced previously.

21. Moreover, the change controls scheduled after January 14, 2002, like those we discussed in our Reply Declaration, either did not have a material effect on the performance



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results or, if the effect was material, were equally likely to increase as to decrease the reported quality of Verizon's performance. For example, CCNJ-2002-03890-PRE notified CLECs that Verizon would have to make a change to the programming of the EnView script to account for a recent change to the pull down menus for the Web GUI interface. This change caused EnView not to capture retail data for two of the pre-ordering response timeliness measurements (PO-1-03 and PO-1-05) for a total of only six days in the February 2002 data month. The loss of this data is unlikely to have had a material impact on Verizon's reported performance — not only did Verizon satisfy the performance standard for both measurements in each month from December 2001 through February 2002, but the reported retail performance for February 2002 for both measurements was within one-tenth of one second of the average retail performance for each of those measurements from December 2001 to January 2002. See Performance Trend Report at 2-4 (Supplemental App. B, Tab 2).

22. Another of the change control notifications AT&T lists, CCNJ2002-03416-ORD, informed CLECs that, for certain ordering measurements for special services and trunks, a small percentage of duplicate ASRs were included in the data. Verizon explained that these duplicates were a result of the fact that different transactions associated with an ASR could be processed by different service representatives in different centers. Verizon has determined that less than two-tenths of one percent of the ASRs for specials and trunks were duplicates. Therefore, the inclusion of these duplicates is unlikely to have had a material impact on Verizon's reported performance.

23. As we have explained, the processes required to convert Verizon's retail and wholesale data into performance results are tremendously complex and implementation of performance measurements is an iterative process that will never be "final." See

Guerard/Canny/DeVito Reply Decl. ¶ 19. Verizon provides CLECs with numerous opportunities to raise questions or concerns about metrics change control notifications. See id. ¶ 18; Guerard/Canny/DeVito Decl. ¶¶ 144-145. Finally, under the New Jersey Incentive Plan, Verizon is obligated to restate its performance reports and to revise any credits under the Plan if it identifies any inaccuracies in its performance reports. See Guerard/Canny/DeVito Reply Decl. ¶ 27.

## IV. Incentive Plan

24. As we explained in our Declaration, the Incentive Plan currently in place in New Jersey was devised, and refined, by the New Jersey BPU through 15 months of proceedings involving Verizon, the CLECs, and the BPU's staff. See Guerard/Canny/DeVito Decl. ¶ 152. The BPU has concluded that "payments under the [Plan] are sufficient to prevent back-sliding." New Jersey BPU Report at 83.

25. Two commenters — AT&T and MetTel — raise issues with respect to the exclusion of performance data from the Carrier-to-Carrier measurements when the CLEC requests, and Verizon provides, special handling of CLEC orders on a project basis. Neither claim has merit.

26. The standards and benchmarks in the Carrier-to-Carrier Guidelines are designed to measure Verizon's performance in processing orders pursuant to its standard practices. Nonetheless, from time to time, when a CLEC has a group of orders for which it requests special handling — that is, handling that diverges from those standard procedures — as a result of particular circumstances, Verizon agrees with the CLEC to handle those orders as a "project." As a result of this special handling, however, Verizon could be deemed to have "missed" the applicable performance standard for various measurements, even though it provided the CLEC with exactly what was requested. For this reason, CLECs in New Jersey, and in other states,

provide Verizon with a signed "project letter" that authorizes Verizon to exclude the orders from a very limited set of performance measurements. For a CLEC to insist on the inclusion of these orders in the performance measurements — while at the same time requesting special handling that is potentially inconsistent with the standards established for those measurements — is nothing more than an attempt to game the system in order to receive payments under the Incentive Plan.

27. In its comments, AT&T claims that, when it sought to have a large number of orders to port numbers handled on a project basis, Verizon improperly attempted to require AT&T to agree to exclude the data from those orders from the performance measurements and, therefore, from the Incentive Plan calculations. See AT&T Comments at 31-33; AT&T's Regan Decl. ¶¶ 4-9. AT&T's description of the events surrounding these orders is incomplete and misleading. Contrary to AT&T's claim, Verizon did not require AT&T to agree that performance data on the project would be excluded from all performance measurements. See AT&T's Regan Decl. ¶ 6. Instead, Verizon identified a limited set of measurements — such as LSRC and reject timeliness and average offered and completed intervals — where Verizon's performance results could be affected by the special handling that AT&T requested.

28. Moreover, as explained above, AT&T is incorrect that excluding data from these measurements for orders handled on a project basis is "plainly unreasonable." AT&T's Regan Decl. ¶ 7. As AT&T recognizes, it requested that these orders receive "special handling." Id. ¶¶ 5-6. Specifically, AT&T sought to have Verizon ensure that its approximately *** *** number porting orders all received the same due date, *** ***, rather than having multiple due dates, as would likely occur if AT&T's orders did not receive special handling. In order to accommodate AT&T's request, Verizon would have to assign a limited number of

specific individuals in its service centers to handle AT&T's orders, rather than have those orders assigned through the standard process. Although this step would provide AT&T with the special service that it requested, it may also increase the chance that Verizon would "miss" measurements associated with, for example, LSRC and reject intervals.

29. As AT&T acknowledges, it ultimately provided Verizon with a project letter stating that performance data for the project orders would be excluded from five measurements. However, that letter incorrectly stated that Verizon refused to process AT&T's orders if AT&T did not agree to these exclusions. It also contained other legal qualifications that led Verizon to refuse to accept AT&T's project letter. Nonetheless, as part of Verizon's commitment to provide CLECs with the highest quality service, Verizon intends to devote the resources necessary to provide AT&T with its requested due date for all of these orders, even though the performance results will not be excluded from the measurements. Verizon understands that these orders will be submitted *** ***.

30. As Verizon explained in its Supplemental Filing, although Verizon had previously excluded two projects that required special handling of CLEC orders from certain ordering measures in January, it had not excluded those projects from the relevant OR-4 measures. See McLean/Wierzbicki/Webster/Canny Supplemental Decl. ¶ 18 n.3. In particular, in January 2001, MetTel sought to migrate more than **** **** coin telephone lines that had previously been served by another CLEC. See id. Because MetTel expressed concern with getting the migration done quickly, Verizon agreed to work outside regular business hours to accomplish this project. MetTel sent all of its orders on January 9, 2002, and Verizon completed the project on January 18, 2002. As part of the special handling for these orders, Verizon agreed not to reject or query the orders, even though MetTel acknowledged that there were errors in some of

the listings, and even though these errors would be likely to increase the number of post-completion discrepancies that required manual investigation to get the billing system updated and the completion notice generated. In addition, some of the lines were suspended — for example, in seasonal suspend status — and MetTel wanted to keep them suspended. However, in order to migrate these lines, Verizon had to "un-suspend" them, migrate them, and then re-suspend them.

31. In consideration of this special handling, MetTel provided Verizon with a signed project letter that permitted Verizon to exclude these orders from the LSRC and reject measurements, service order interval measurements, and service order accuracy measurements. See Attachment 2. Although Verizon excluded these orders from the appropriate OR-1, OR-2, and OR-6 measurements, when it reported the January 2002 performance data, Verizon failed to exclude these orders from the following OR-4 measurements, which pertain to service order intervals: OR-4-06-3000, OR-4-07-3000, OR-4-08-3000, OR-4-09-3000, and OR-4-11-3000. Attachment 15 to the McLean/Wierzbicki/Webster/Canny Supplemental Declaration contains the corrected CLEC-aggregate and MetTel-specific results for these measurements. (Upon further review of Attachment 15, Verizon has discovered a minor error in the corrected MetTel data for OR-4-06-2000 included on page 60 of that attachment. Attachment 3 to our Supplemental Reply Declaration contains the corrected page, which shows restated performance of *** *** hours and *** *** observations, rather than *** *** hours and *** *** observations.)

32. This concludes our Reply Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 17, 2002

Elaine M. Guerard

Elaine M. Guerard

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 16, 2002

Julie A. Canny

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 18, 2002

Marilyn C. Devito

Marilyn C. Devito

SUPPLEMENTAL REPLY DECLARATION OF
ELAINE M. GUERARD, JULIE A. CANNY,
AND MARILYN C. DEVITO

ATTACHMENT 1

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BI-3-04 % CLEC Billing Claims Acknowledged Within Two Business Days

| | December 2001 | January 2002 | February 2002 | Dec 2001 - Feb 2002 |
|---|---|---|---|---|
| CLEC BOS BDT Billing Claims Acknowledged On Time | 8 | 26 | 20 | 54 |
| CLEC BOS BDT Billing Claims | 10 | 26 | 21 | 57 |
| Percentage | 80% | 100% | 95% | 95% |

BI-3-05 % CLEC Billing Claims Resolved Within 28 Calendar Days After Acknowledgement

| | December 2001 | January 2002 | February 2002 | Dec 2001 - Feb 2002 |
|---|---|---|---|---|
| CLEC BOS BDT Billing Claims Resolved On Time | 18 | 13 | 26 | 57 |
| CLEC BOS BDT Billing Claims Resolved | 18 | 13 | 27 | 58 |
| Percentage | 100% | 100% | 96% | 98% |

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BI-2-02 Timeliness of Carrier Bill - Electronic - BOS BDT Format - Bill of Record

| **Reported** | October 2001* | November 2001** | December 2001** | January 2002° | February 2002°° |
|---|---|---|---|---|---|
| CLEC BOS BDT Bills Returned On Time | 17 | 23 | 26 | | 32 |
| CLEC BOS BDT Bills | 17 | 23 | 26 | | 32 |
| Percentage | 100% | 100% | 100% | | 100% |

| **Actual** | October 2001 | November 2001 | December 2001 | January 2002 | February 2002 |
|---|---|---|---|---|---|
| CLEC BOS BDT as BOR Bills Sent on Time | 18 | 26 | 28 | 42 | 36 |
| CLEC BOS BDT as Bill of Record Bills | 18 | 26 | 28 | 42 | 36 |
| Percentage | 100% | 100% | 100% | 100% | 100% |

* See Guerard/Canny/DeVito Decl. Att. 4.

** See Guerard/Canny/DeVito Decl. Att. 3.

° Not previously reported. See Guerard/Canny/DeVito Supplemental Reply Decl. ¶ 6.

°° See Performance Trend Report at 20 (Supplemental App. B, Tab 2).

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